

COURTESY COPY



# JASPER SCHLESINGER

Attorneys at Law LLP

**Laurel R. Kretzing**  
Partner  
516-393-8258  
lkretzing@jaspanllp.com

300 GARDEN CITY PLAZA • GARDEN CITY, NEW YORK 11530  
TELEPHONE 516.746.8000 • FAX 516.393.8282  
www.jaspanllp.com

**DELAWARE OFFICE**  
913 North Market Street  
Wilmington, DE 19801  
Telephone 302.351.8000  
Fax 302.351.8010

June 24, 2009

Via Fax – 212-805-6326

and Original Via ECF

Judge Colleen McMahon  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York New York 10007-1312

MEMO ENDORSED

E-FILED BY: L Kretzing  
DATE: 6/25/09  
DOCKET NO: 9

**Re: Henry Lam, on behalf of himself and all other similarly situated  
v. Donald J. Trump, et al.  
U.S. District Court No.: 09 CV 5211**

Dear Justice McMahon:

This firm has been retained by Donald J. Trump, Trump Marks Baja, LLC, Trump Marks, LLC, Trump Organization, LLC, and Trump Organization, Inc. (the "Trump Defendants"). This letter respectfully requests an extension of the Trump Defendants' time to respond to the complaint until July 29, 2009. The original date to respond to the complaint is June 29, 2009. No prior requests for an extension have been made. I have called all three attorneys listed as counsel for the plaintiff and left messages stating that I was requesting extensions of time for the Trump Defendants to respond to the complaint until July 29, 2009. I called Joe R. Whatley, Jr., on June 23, 2009 and left a message on his assistant's voicemail. I called Edith M. Kallas, on June 24, 2009 and left a message on her voicemail. I called William M. Audet today and left a message on his voicemail. None of the attorneys have returned my phone calls. The requested extension does not affect any other scheduled date. There is a conference scheduled for July 17<sup>th</sup>, however, I do not at this time anticipate that this request will affect my ability to appear at that conference.

The reason for this request is that we have just been retained to represent the Trump Defendants in this matter. The matter is complex and is related to an action which is pending in the State Court in California entitled: Derek O'Brien and Pamela O'Brien, et al. v. Donald J. Trump, et al., California Superior Court, Los Angeles County Case No. BC409651, which requires our firm to coordinate with California counsel.

Thank you for your attention to this matter.

USDS SDNY  
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cc: William M. Audet, Esq. - Via Facsimile transmission  
Edith M. Kallas, Esq. - Via Facsimile transmission  
Joe R. Whatley, Jr., Esq. - Via Facsimile transmission  
Christopher Philip Kohn, Esq. - Via Facsimile transmission

Respectfully submitted,

LAUREL R. KRETZING

*Just anyone  
in the same  
situation*

*Colleen McMahon  
6/30/09*